

# **EXHIBIT G2**



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December 27, 2018

**VIA Electronic Mail**

Honorable Joel A. Pisano (Ret.)  
Walsh Pizzi O'Reilly Falanga, LLP  
One Riverfront Plaza  
1037 Raymond Boulevard, Suite 600  
Newark, NJ 07102

**Re: *In Re: Johnson & Johnson Talcum Powder Products Marketing, Sales  
Practices and Products Liability Litigation*  
MDL No. 2738**

Dear Judge Pisano:

We are in receipt of Your Honor's December 27, 2018 letter and Proposed Case Management Order related to the deposition of Dr. Ghassan Saed. As previously indicated, the PSC does not object to the production of Dr. Saed's laboratory notebooks which contain the data and other information requested by Defendants. However, Dr. Saed is out of the country for the holiday and will not return to his lab until January 6, 2019. Therefore, it is not possible for the PSC to produce the requested documents until January 14, 2019, at the earliest. To the extent production by this date raises concern with Defendants, arrangements can be made to reschedule Dr. Saed's deposition for a date that is at least three weeks beyond the January 14, 2019 date of production.

Further, in Plaintiffs' Steering Committee's Response and Objections to the Notice of Oral and Videotaped Deposition of Ghassan M. Saed, PhD and Duces Tecum, the PSC objected to the term "funding" as vague and ambiguous. To the extent Defendants properly inquire at deposition, Dr. Saed will testify as to the costs associated with the subject research and how such costs were paid. The PSC will produce document related to funding or the payment of costs to the extent that any such documents exist.

In addition, the PSC's respectfully requests that paragraph 3 of the proposed order be modified to state that the laboratory notebooks to be produced relate to the research referenced in the expert's report. As written, the paragraph seems to encompass all research from an expert's lab regardless of when the research was conducted and its relevance to talcum powder.

Honorable Joel A. Pisano (Ret.)

December 27, 2018

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Thank you for your consideration of these matters.

Very truly yours,

*/s/ P. Leigh O'Dell*

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